

Remarks

Claims 1-3, 5, 7-14, and 25-36 are pending. Claims 1-3 and 5 were rejected. Claims 25-26 are allowed and claims 7-14 are objected to as being dependent on a rejected base claim. Reconsideration of the rejections of all rejected claims is requested.

I. Rejection of Claims 1-3 Under 35 U.S.C. §103(a)

Claims 1-3 were rejected under 35 U.S.C. §103(a) as being unpatentable over Altunbasak (U.S. 6,597,816) and further in view of a printed publication (Mosaic Representations of Video Sequences and Their Applications).

The applicants contend that the rejection based on Altunbasak is moot per 35 U.S.C. §103(c). As a first criteria, Altunbasak would qualify as prior art under 35 U.S.C. §102(e). Secondly, Altunbasak and the present application are both under an obligation of assignment to the Hewlett-Packard Development Company, L.P. Thus, the rejection under 35 U.S.C. §103(a) is moot.

Based on the foregoing, the applicants request reconsideration of the rejections.

II. Rejection of Claims 1-3 and 5 Under 35 U.S.C. §103(a)

Claims 1-3 and 5 were rejected under 35 U.S.C. §103(a) as being unpatentable over Kumar (U.S. 6,173,087) and further in view of a printed publication (Mosaic Representations of Video Sequences and Their Applications) by Irani.

According to the office action, Irani discloses the sum of squares differences recited in claim 1 in the right column of page 607. The applicant disagrees with this holding of the office action. In summary, the applicants contend that the sum of squares algorithm recited in claim 1 differs significantly from the sum of squares algorithm disclosed by Irani. The sum of squares algorithm of claim 1 is used to

derive motion parameters, wherein motion parameters are derived by minimizing the sum of squares between pairs or consecutive images.

Irani, on the other hand, discloses calculating the sum of squares based on velocity. More specifically, the sum of squares algorithm disclosed in Irani includes velocity, which is significantly different than the sum of squares algorithm recited in claim 1, which does not include velocity. For example, claim 1 recites deriving the motion by minimizing the sum of squares and the sum of squares disclosed by Irani includes the velocity within the algorithm. Thus, the sum of squares algorithms are very different. Therefore, the combination of Irani and Kumar does not disclose all the elements of claim 1 and cannot render claim 1 obvious.

In addition to Irani and Kumar not disclosing all the elements of claim 1, there is no motivation to combine Irani and Kumar. Irani is related to mosaic based representations of video images and Kumar is related to lens distortion correction. The office action does not indicate any motivation to combine these references found in either reference. Without motivation to combine, the rejection based on 35 U.S.C. §103(a) is not proper.

Based on the foregoing, the rejection of claim 1 based on 35 U.S.C. §103(a) has been overcome and the applicants request reconsideration of the rejections. The remaining claims are allowed based on their dependence and for other reasons.

III. Rejection of Claim 1 Under 35 U.S.C. §103(a)

Claim 1 was rejected under 35 U.S.C. §103(a) as being unpatentable over Altunbasak (U.S. 6,597,816) and further in view of Iwata (U.S. 5,604,546).

The applicants contend that the rejection based on Altunbasak is moot per 35 U.S.C. §103(c). As a first criteria, Altunbasak would qualify as prior art under 35 U.S.C. §102(e). Secondly, Altunbasak and the present application are both under an obligation of assignment to the Hewlett-Packard Development Company, L.P. Thus, the rejection under 35 U.S.C. §103(a) is moot.

Based on the foregoing, the applicants request reconsideration of the rejection.

In view of the above, all of the pending claims are now believed to be in condition for allowance and a notice to that effect is earnestly solicited.

Respectfully submitted,
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